



**Department of Health and Human Services
Health Care Financing Administration
Center for Health Plans and Providers (CHPP)
Medicare Managed Care
Operational Policy Letter #97.060
OPL97.060 [Revised]**

Date: July 17, 1998

Subject: Updating of the "Medicare Managed Care National Marketing Guide"

Issue/Question: Change to the "Guidelines for Review of Marketing Materials for National Plans; The Lead Region Concept"

Resolution/Answer: This document is a revision to information contained in OPL 97.060, dated November 14, 1997, entitled: "Chapter XI; Guidelines for Review of National Marketing Materials" (5 pages)

Note: The circumstance precipitating this revision is that the lead Regional Office (RO) is now solely responsible for the approval of national marketing materials. Local RO's (as defined in the OPL) will no longer play a role in approval of national materials.

This OPL is the second update to the Medicare Managed Care National Marketing Guide initially issued on November 14, 1997.

Contact: HCFA Regional Office Managed Care Staff

cc: Regional Office Managed Care Staff
Center for Beneficiary Services

**Chapter XI
Guidelines for Review of Marketing Materials for National Plans**

Note: All changes appearing in the OPL are underlined and appear in "bold" type. Several items have been deleted in their entirety. The original OPL pages for

this section should be discarded to avoid confusion.

I. Introduction

These guidelines, effective April 8, 1998, are to be used by HCFA national plan teams and national plans that prepare marketing materials for use in more than one region. The guidelines apply both to marketing materials submitted with new applications as well as post contract marketing efforts.

The purposes of these guidelines are:

- to streamline the marketing process for national plans;
- to avoid unnecessary repetition of document submission and review;
- to decrease the amount of time currently being spent on marketing material review.

II. Definitions

lead RO	<u>HCFA Regional Office (RO) with authority to approve plan's national marketing material</u>
local RO	HCFA RO with a contracted plan in its region
national plan team	staff from each HCFA RO where a plan has a Medicare contract
local plan	contracted plan within a HCFA region
national plan material	material identified by a national plan for use in more than one HCFA region
local material	material specific to a local plan
PCT	Product Consistency Team--comprised of RO and CHPP staff with responsibility to assure consistency in the application of the national marketing guidelines
PPPPG	Plan & Provider Purchasing Policy Group within the Center for Health Plans & Providers (CHPP) responsible for making policy determinations.

III. Determining The Lead Region

Generally, the RO where the plan's corporate office is located will serve as the lead RO. In some situations, a lead RO may not be the one in which the plan's corporate office is located. For example:

- the plan's corporate headquarters is in a region with no Medicare contracts.
- the national plan team designates another lead RO.
- the corporate office location changes.

Authority for determination of lead RO assignments resides with RO officials representing the geographic locations of the national plan headquarters and contract sites. When necessary, appropriate RO consortia administrators will assist in lead RO determinations.

IV. Responsibilities

A. Health Plan

- assures materials submitted are consistent with the requirements in the *Medicare Managed Care National Marketing Guide* and the *HMO/CMP Manual*.
- **submits for approval proposed copies of its national marketing materials to the lead RO with a dated cover letter which identifies the material as national. (note: all submitted materials, both national and local, must be identified with a sequential identification code. The identifying system will be determined by the RO "national plan team").**
- submits for approval proposed copies of local marketing materials to the local RO with a dated cover letter. This material will be reviewed and approved by the local RO for local use only.
- **identifies previously approved local material that the plan now wants to use nationally and submits it to the lead RO for approval. Such materials must be accompanied by the local RO's original approval letter/documentation.**
- distributes final copies of its national marketing materials, within a time frame to be determined by its national plan team (10 days after HCFA approval is recommended), to the lead **and local ROs** with a dated cover letter which identifies the recipients. **(Note: Although the local ROs no longer play a part in approval of the national marketing piece, they should be send a finalcopy of the approved material for their records).**

B. Lead RO

- notifies the local ROs of the approval dates for national materials.
- **refers policy issues which require additional development or clarification to the appropriate Central Office component.**
- requests assistance from the PCT, PPPPG or the RO HPPA Managers as necessary.
- determines Use and File status for national plan material.

- (OPTION: each lead RO and the associated national plan team RO s may request the health plan to include at the bottom of each page of marketing material an identification/approval code (e.g., HCFA**MM/YY, in which the ** represents the number of the lead RO and the MM/YY is the month and year the piece was approved. This would allow the plan to submit only those pages that have changes in the annual review of such items as the EOC , Member handbook, etc.).

C. Local RO

- approves marketing materials which are applicable to the local plan(s) only. (approval letters will state that material is approved for local use only.)
- determines Use and File status for local material.

D. Product Consistency Team

- meets periodically to resolve issues involving inconsistencies in the interpretation, application and approval of marketing materials.
- requests written marketing policy clarifications and determinations from PPPPG.
- drafts written updates for the *Medicare Managed Care National Marketing Guide* and distributes them nationally to all plans and ROs.

E. Plan & Provider Purchasing Policy Group

- resolves policy questions and distributes policy determinations to all regions.
- assures that the *Medicare Managed Care National Marketing Guide* and the *HMO/CMP Manual* are updated to reflect changes in law, regulations and policy.

LEAD REGIONAL OFFICE ASSIGNMENTS OF MULTI-STATE, "CHAIN" CONTRACTS

(November 14, 1997)

REGION	PLAN NAME
1	Cigna
2	HIP, NYL-Care, Prudential, Oxford

3	Aetna/US-HealthCare
4	Humana
5	United Health Care - MN
6	-
7	Coventry, Mutual of Omaha
8	-
9	FHP/PacifiCare, Kaiser, Maxicare, QualMed/HSI/Foundation, Sierra Health
10	-